



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

AFM
F. #2016R02228

*271 Cadman Plaza East
Brooklyn, New York 11201*

December 11, 2019

By Email and ECF

Andrew J. Frisch
One Penn Plaza, Suite 5315
New York, NY 10119

Re: United States v. Aleksandr Zhukov
Criminal Docket No. 18-633 (ERK)

Dear Mr. Frisch:

Enclosed please find the government's discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure, consisting of the following material:

- **ZHU000297** – Open-source data from the WHOIS system regarding IP addresses controlled by the defendant; and
- **ZHU000298** – Open-source data from the University of Oregon Route Views Project regarding IP addresses controlled by the defendant.

The following material produced under cover of this letter is designated **sensitive discovery material** pursuant to the protective order issued by the Court on July 31, 2019.

- **ZHU000289** – Records provided by DoubleVerify with respect to the charged scheme;
- **ZHU000290** – Records provided by PNC Bank with respect to an IP address leasing company hired by the defendant;
- **ZHU000291** – Photographs taken during the search of the defendant's apartment;
- **ZHU000292** – Data provided by the advertising platform designated "Platform-1" in the government's discovery letter of August 12, 2019;
- **ZHU000293** – Spreadsheet showing revenue withheld by an advertising platform from its supply-side partner in connection with traffic generated by the defendant;

- **ZHU000294** – Browsing and search history with respect to three Google accounts;
- **ZHU000299** – Account records relating to a bank account held at Česka Sporitelna bank in the Czech Republic;
- **ZHU000300** – Records relating to a second account held at Česka Sporitelna bank in the Czech Republic;
- **ZHU000301** – Records relating to a bank account held at Raffeyen Bank in the Czech Republic; and
- **ZHU000302** – Records relating to a second account held at Raffeyen Bank in the Czech Republic.

The following material produced under cover of this letter is designated **attorneys' eyes only** pursuant to the protective order issued by the Court on July 31, 2019:

- **ZHU000295** - Records from Platform-2 (as designated in the government's discovery letter of August 12, 2019), reflecting credits to a customer of Platform-2 connected with traffic generated by the defendant;
- **ZHU000296** – Records from an advertising platform ("Platform-5" reflecting payments between Platform-5 and its demand and supply partners in connection with traffic generated by the defendant;
- **ZHU000303** – Metadata provided by Platform-3 in connection with information contained in the logs produced to you on August 12, 2019 with Bates number ZHU000285; and
- **ZHU000304** – Data regarding fraudulent traffic, provided by the entity designated Platform-1 in the government's discovery letter of August 12, 2019.

The government also requests reciprocal discovery from the defendant.

Very truly yours,

RICHARD P. DONOGHUE
United States Attorney

By: /s/ Alexander Mindlin
Alexander Mindlin
Assistant U.S. Attorney
(718) 254-6433

Enclosures

cc: Clerk of the Court (ERK) (by ECF) (without enclosures)